



## Telecom Decision CRTC 2026-151

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### **CISC Emergency Services Working Group – Intermediary 9-1-1 call centres and caller’s official language**

#### **Summary**

9-1-1 is a bridge that connects Canadians to emergency services in times of need. Federal, provincial, territorial, and municipal governments, as well as telecommunications service providers (TSPs) all play a role in ensuring that Canadians can access 9-1-1 services. The Commission’s role is to regulate the TSPs that connect 9-1-1 calls to local 9-1-1 call centres.

Canadians need access to 9-1-1 services in their official language of choice. In this decision, the Commission is taking action to help ensure this access within its mandate under the *Telecommunications Act*.

The CRTC Interconnection Steering Committee’s Emergency Services Working Group (ESWG) is a public forum composed of 9-1-1 experts representing first responders, TSPs, public and intermediary call centres, the Commission, and provincial, territorial and municipal government authorities. In September 2024, the Commission requested that the ESWG (i) examine opportunities to improve access to 9-1-1 services in the caller’s preferred official language when calls are routed to intermediary call centres, and (ii) provide recommendations to strengthen the system.

Between September 2024 and September 2025, the ESWG consulted on possible ways to help ensure that Canadians have access to 9-1-1 services in their official language of choice within the Commission’s mandate. The Commission worked alongside the ESWG to ensure expansive consultation with stakeholders. In addition to the wide range of stakeholders regularly represented in the ESWG, the Commission facilitated the participation of Official Language Minority Communities in the consultation.

Following the ESWG’s consultation process, it submitted report [ESRE0120](#) – *Intermediary 9-1-1 Call Centres and Caller’s Official Language* (the Report) to the Commission. The Report’s recommendations include routing solutions that TSPs can implement to ensure that 9-1-1 calls are answered in the caller’s preferred official language, measures to monitor the effectiveness of the routing solutions, and the development of public-facing communications to inform Canadians on the use of intermediary call centres in specific circumstances.

The Commission approves the Report’s recommendations, with the following modifications:

- The Commission directs TSPs that are mandated to route 9-1-1 calls to intermediary call centres to implement at least one routing solution recommended in the Report, in conjunction with implementing contingency processes at intermediary call centres. TSPs that route 9-1-1 calls to intermediary call centres on a voluntary basis are encouraged to adopt the same measures.
- The Commission directs TSPs to communicate their plans regarding their selected routing solution(s) publicly.
- The Commission establishes reporting requirements to measure the effectiveness of these routing solutions.

A dissenting opinion by Commissioner Bram Abramson is attached to this decision.

## **Background**

1. 9-1-1 is a bridge that connects Canadians to emergency services in times of need. Federal, provincial, territorial, and municipal governments, as well as telecommunications service providers (TSPs), all play a role in ensuring that Canadians can access 9-1-1 services. The Commission's role is to regulate the TSPs that connect 9-1-1 calls to local 9-1-1 call centres.
2. In the majority of cases, 9-1-1 calls are connected directly to provincial, territorial, or municipal 9-1-1 call centres, also known as public safety answering points (PSAPs). PSAPs are the responsibility of provinces, territories, and municipalities, and it is the relevant province, territory, or municipality that determines the official language(s) of service.
3. TSPs have an obligation to connect 9-1-1 calls to PSAPs. In the very limited circumstances where provincial, territorial, and municipal governments have not set up PSAPs, TSPs have created or contracted third-party call centres, known as intermediary call centres. These intermediary call centres determine a caller's location and transfer them to the appropriate PSAP.
4. Intermediary call centres are also used in other circumstances, including when a caller is using voice over Internet Protocol (VoIP) services that are run over the Internet and where the caller's physical location is not known.
5. The CRTC Interconnection Steering Committee's Emergency Services Working Group (ESWG) is a public forum composed of 9-1-1 experts representing first responders, TSPs, public and third-party 9-1-1 call centre operators, the Commission, and provincial, territorial, and municipal government authorities. In September 2024, the Commission requested that the ESWG (i) examine opportunities to improve access to 9-1-1 services in the caller's preferred official language when calls are routed to intermediary call centres, and (ii) provide recommendations to strengthen the system.
6. The Commission worked alongside the ESWG to ensure expansive consultation with stakeholders. In addition to the wide range of stakeholders regularly represented in the ESWG, the Commission facilitated the participation of Official Language Minority Communities

(OLMCs) in the consultation. Between September 2024 and September 2025, the ESWG held meetings every two weeks to discuss possible solutions within the Commission's mandate.

7. This consultation has now resulted in the ESWG delivering a comprehensive report with recommendations to the Commission. Following receipt of the ESWG's report, the Commission invited direct comments from all OLMCs.
8. Section 26 of the *Official Languages Act* (the OLA) states that federal institutions that regulate activities related to health, safety, and security have a duty to ensure, wherever it is reasonable to do so in the circumstances, that members of the public can communicate with and obtain available services in relation to those activities in both official languages. Section 41 of the OLA requires federal institutions to take positive measures to support OLMCs, to foster the full recognition and use of both official languages in Canadian society, and to protect and promote the French language in each province and territory.

## The Report

9. On 11 September 2025, the ESWG filed report [ESRE0120 – Intermediary 9-1-1 Call Centres and Caller's Official Language](#) (the Report). The Report included contributions from l'Association canadienne-française de l'Alberta, la Coalition pour le service 9-1-1 au Québec, le Comité 9-1-1 du SCFP [Syndicat canadien de la fonction publique]-Québec, Northern Communication Services Inc., the OLMC Working Group,<sup>1</sup> Rogers Communications Canada Inc., and TELUS Communications Inc. In addition to those who directly contributed to the development of the Report and its recommendations, stakeholders, including OLMC representatives and government entities such as the Ministère de la Sécurité intérieure<sup>2</sup> in Quebec, were provided an opportunity to provide comments on the Report.

## Potential solutions

10. The Report found that the ideal solution to ensure 9-1-1 calls are answered in the caller's preferred official language would be for all 9-1-1 calls to be routed directly to PSAPs, without the use of intermediary call centres, and for those PSAPs to provide service in both official languages. However, the Report indicated that, due to the use of services such as nomadic VoIP and rare errors that prevent the location of the caller from being available, intermediary call centres will remain necessary for the foreseeable future. The Report also indicated that it would be difficult to implement an approach requiring all intermediary call centre telecommunicators to speak both official languages.
11. The Report included four routing solutions to be implemented by TSPs, which are based on: the official language a customer has selected for the purposes of billing or 9-1-1 service, the

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<sup>1</sup> The OLMC Working Group was a temporary working group under ESWG, comprised of ESWG and OLMC representatives, formed specifically to discuss official language issues.

<sup>2</sup> Prior to 21 April 2026, the Ministère de la Sécurité intérieure was known as the Ministère de la Sécurité publique.

customer's billing address, the calling number area code, or the cell site address. A complete description of the four routing<sup>3</sup> solutions can be found in Appendix 2 to this decision.

12. The Report noted that while these routing solutions can help increase the likelihood of 9-1-1 calls being answered in the caller's preferred official language at intermediary call centres, this solution should be combined with a requirement that intermediary call centres maintain an appropriate number of telecommunicators who speak both official languages and contingency processes, such as language switching, call transfers, and interpretation services. These requirements should be reflected in the agreements between TSPs and intermediary call centres.

### **Monitoring strategies**

13. As an initial monitoring strategy, the Report recommended that TSPs or the Commission collect data on complaints related to calls not being answered in the caller's preferred official language. According to the Report, this preliminary data could form a baseline against which to measure the effectiveness of solutions implemented by TSPs over time.
14. The Report further noted that the Commission should investigate individual complaints involving intermediary call centres that are related to official languages. It added that any TSP or intermediary call centre receiving an official languages complaint should report it to the Commission.

### **Public-facing communications**

15. To ensure that customers understand how 9-1-1 calls are handled, the Report recommended that TSPs post which routing solutions they are using on their website and include a statement in their user agreement or terms and conditions directing customers to this information. The Report noted that TSPs should leverage a customer's preferred official language (e.g., as reported for billing purposes) to route emergency calls to a telecommunicator who speaks that language. TSPs should also indicate whether a customer's preferred official language will be used to route calls.
16. In the Report, the ESWG committed to developing public-facing communications materials to inform Canadians about the use of intermediary call centres. These communications materials will direct consumers to TSPs' websites for information regarding the routing solutions they have implemented and the contingency plans in place to adopt the caller's preferred official language at intermediary call centres. The Report suggested that these communications should be shared by the Commission.

### **Commission's analysis**

17. The Commission considers that the Report's recommendations will increase Canadians' access to 9-1-1 services in the official language of their choice. Further, the Commission considers that the

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<sup>3</sup> For clarity, "routing" refers to delivering the call to either the English or French queue of the TSP's intermediary call centre.

recommendations are aligned with the Commission's strategic objectives for 9-1-1, namely using standards-based solutions that allow for flexibility and strive for national consistency.

18. The Report's recommendations include practical and balanced measures that can be implemented immediately. These measures, with the modifications noted in Appendix 1 to this decision, combine technical solutions, operational processes, and consumer awareness initiatives. The Commission is committed to monitoring the impact of these measures through reports to be filed by TSPs and to ensure oversight, where necessary, in the public interest.
19. Further, the ESWG will continue to actively monitor and assess emerging solutions aimed at improving the routing of 9-1-1 calls. This includes examining opportunities to enable VoIP-based 9-1-1 calls to be routed directly to the appropriate PSAP, where feasible, to enhance accuracy, efficiency, and overall service reliability.

### **Potential solutions**

20. Regarding the recommended solutions, the Commission acknowledges that no single routing solution can be implemented universally. Therefore, the Commission considers that the four routing solutions recommended in the Report offer meaningful flexibility to TSPs and allow them to adopt the solutions that are best aligned with their operations. These routing solutions also ensure a greater level of consistency and standard of service across all TSPs and intermediary call centres.
21. The Commission considers that these solutions support the Commission's objective of helping to ensure that 9-1-1 calls are answered in the caller's preferred official language.
22. The Commission orders all TSPs that are mandated to route 9-1-1 calls to intermediary call centres pursuant to Telecom Decision 2005-21 and Telecom Regulatory Policy 2019-66 to abide by these obligations. The Commission notes that some TSPs route 9-1-1 calls to intermediary call centres on a voluntary basis; the Commission encourages those TSPs to also follow the ESWG recommendations.<sup>4</sup>

### **Monitoring strategies**

23. Regarding monitoring strategies, the Commission considers that complaints received from Canadians who report being served in a language other than their preferred official language will create a baseline for monitoring the effectiveness of the requirements imposed on TSPs.
24. The Commission notes that the Report's recommendation regarding the reporting of official language-related complaints did not set out what should be included in those reports and how they should be shared with the Commission. Accordingly, the Commission directs all TSPs to file

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<sup>4</sup> Certain TSPs route calls to an intermediary call centre pursuant to Commission determinations in some circumstances and on a voluntary basis in others. Those TSPs are subject to the Commission's direction in this decision, rather than being encouraged to fulfill the new obligations.

an Initial Complaints Baseline Report with the Commission by **2 March 2027**, as set out in Appendix 1 to this decision. The Commission also directs all TSPs to file a Follow-up Complaints Report with the Commission by **1 March 2028**.

### **Public-facing communications**

25. The Commission is of the view that requiring TSPs to inform their customers of the routing solutions they implement is consistent with and complementary to the existing 9-1-1 customer notification and awareness obligations of Canadian TSPs offering local VoIP service. Since these TSPs are already required to notify their customers about the limitations of VoIP service when calling 9-1-1,<sup>5</sup> they can include information about the routing solutions they use as part of their existing VoIP-related customer notification materials.
26. In addition, the Commission welcomes the ESWG's commitment to developing public-facing communications materials that will inform Canadians on what to expect when making 9-1-1 calls over VoIP services. The Commission expects the ESWG to complete these materials by **15 January 2027**. The communications materials will be shared on the Commission's website.
27. The Commission is also requesting that the ESWG develop standard wording that TSPs routing 9-1-1 calls to intermediary call centres can use to develop their own communications materials. TSPs that route 9-1-1 calls to intermediary call centres on a voluntary basis are encouraged to participate in sharing the messaging developed by the ESWG.

### **Conclusion**

28. In light of all of the above, the Commission approves the recommendations in the Report, with some precisions on how TSPs will implement these recommendations. The Commission directs TSPs that are mandated to route 9-1-1 calls to intermediary call centres to implement the measures set out in Appendix 1 to this decision. TSPs that route 9-1-1 calls to intermediary call centres on a voluntary basis are encouraged to adopt these same measures.

Secretary General

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<sup>5</sup> See Telecom Decision 2005-21.

## Appendix 1 to Telecom Decision 2026-151

### Requirements for telecommunications service providers (TSPs) regarding intermediary call centres and official languages

Regarding potential solutions, the Commission:

- directs TSPs that are mandated to route 9-1-1 calls to intermediary call centres pursuant to Telecom Decision CRTC 2005-21 and Telecom Regulatory Policy CRTC 2019-66 and encourages TSPs that route 9-1-1 calls to intermediary call centres on a voluntary basis<sup>1</sup> to:
  - (i) include in their service contracts or other arrangements with intermediary call centres that they must support both English-speaking and French-speaking 9-1-1 callers (i.e., 24 hours per day, seven days per week) with bilingual staff or any combination of technical solutions (i.e., language queues) and bilingual staff.
  - (ii) include in their service contracts or other arrangements with intermediary call centres that they must support contingency processes for when a call is not answered in a caller's preferred official language. These contingency processes must include: a bilingual intermediary telecommunicator answering with a bilingual greeting and adopting the caller's preferred official language, transferring the call to another telecommunicator capable of speaking the caller's preferred official language or to a bilingual queue with maintained priority, and accessing an interpretation service as a last resort.
  - (iii) implement, by **15 January 2027**, at least one of the routing solutions listed in appendix 2 for each call type where calls are directed to intermediary call centres.
  - (iv) integrate into their ongoing customer notifications information on their chosen routing solution for calls routed to intermediary call centres through the following channels: marketing material used for television, radio, and printed media; the terms and conditions of service; online material, customer service representatives; warning stickers affixed to telephone sets; and billing inserts.
  - (v) file a Routing Solutions Report by **2 March 2027** detailing which routing solutions (by call type) and intermediary call centre contingency processes have been implemented and confirming that they have implemented the required customer notification measures.

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<sup>1</sup> Certain TSPs route calls to an intermediary call centre pursuant to Commission determinations in some circumstances and on a voluntary basis in others. Those TSPs are subject to the Commission's direction in this decision, rather than being encouraged to fulfill the new obligations.

Regarding monitoring strategies, the Commission:

- directs all TSPs that route 9-1-1 calls to intermediary call centres, whether on a mandatory or voluntary basis, to file, by **2 March 2027**, an Initial Complaints Baseline Report establishing an initial baseline for official language-related 9-1-1 complaints. For each complaint received between 1 January 2020 and 1 February 2027, TSPs must provide:
  - (i) the source of the complaint (e.g., caller or public safety answering point [PSAP] telecommunicator);
  - (ii) the type of call affected (e.g., voice over Internet Protocol [VoIP], wireless, or wireline);
  - (iii) the area code and central office code of the caller's number;
  - (iv) the province and municipality where the call was made, if known;
  - (v) the intermediary call centre that answered the call;
  - (vi) the language in which the call was answered and the caller's preferred official language;
  - (vii) the options offered to the caller to handle the call in their preferred official language and the option ultimately used; and
  - (viii) any other information that would help provide a fulsome understanding of the complaint and any remedy applied.
- notes that TSPs filing a Routing Solutions Report, whether on a mandatory or voluntary basis, can combine that report with the Initial Complaints Baseline Report to form a single document.
- directs all TSPs that route 9-1-1 calls to intermediary call centres, whether on a mandatory or voluntary basis, to file, by **1 March 2028**, a Follow-up Complaints Report capturing all the elements of the initial report for each complaint received between 1 January 2020 and 1 February 2028.

Regarding public-facing communications, the Commission:

- requests that the ESWG develop, by **15 January 2027**:
  - (i) public-facing communications to explain that, due to technical limitations, emergency calls may be routed to an intermediary call centre anywhere in Canada and not directly to a PSAP, depending on the area where the call originates and the type of service used (e.g., VoIP); and

- (ii) standard wording TSPs can integrate into their own customer notification materials regarding their chosen routing solution for VoIP-based 9-1-1 calls.
- encourages all TSPs that route 9-1-1 calls to intermediary call centres, whether on a mandatory or voluntary basis, to make the public-facing communications developed by the ESWG available to their customers.

## Appendix 2 to Telecom Decision 2026-151

### Routing solutions for telecommunications service providers (TSPs), as outlined in Report [ESRE0120](#)

Routing solution	Advantages	Disadvantages	Example call type
<p>Routing based on a subscriber's reported language preference for billing or 9-1-1 service</p>	<ul style="list-style-type: none"> <li>• Most accurate method for language routing.</li> <li>• Some TSPs allow this information to be updated through a portal.</li> </ul>	<ul style="list-style-type: none"> <li>• Complex and costly, involving lengthy implementation timelines.</li> <li>• Not supported by all call types. Call routing may need to be modified to route in a non-standard way (e.g., 3<sup>rd</sup> Generation Partnership Project, Alliance for Telecommunications Industry Solutions).</li> <li>• No TSP has implemented this routing solution before.</li> <li>• Assumes that the subscriber is the one placing the call.</li> <li>• Requires customer education.</li> <li>• Problematic for business and multiple-user accounts.</li> <li>• Subscribers may not want to provide the necessary information (e.g., in the case of prepaid services).</li> </ul>	<p>Voice over Internet Protocol (VoIP)-based calls</p>

<p>Routing based on a subscriber's billing address</p>	<ul style="list-style-type: none"> <li>• Quicker to implement than collecting or using subscribers' reported language preference.</li> <li>• Mimics calls directed to a public safety answering point (PSAP) when a subscriber calls from within the exchange served by that PSAP (i.e., routing is based on the preferred official language of the majority of residents in the region encompassing the customer's billing address).</li> </ul>	<ul style="list-style-type: none"> <li>• SafetyNet/Default Routed calls directed to intermediary call centres may not have a location.</li> <li>• VoIP calls directed to intermediary call centres often do not have a registered accurate location.</li> <li>• Not feasible for wireline and wireless call types.</li> <li>• Assumes that the subscriber is the one placing the call.</li> <li>• Assumes that the preferred official language of the subscriber is the same as the primary official language of the region encompassing their billing address.</li> <li>• Problematic for business and multiple-user accounts.</li> </ul>	<p>VoIP-based calls</p>
<p>Routing based on the caller's area code</p>	<ul style="list-style-type: none"> <li>• Quicker to implement than collecting or using subscribers' reported language preference.</li> <li>• Some TSPs already use this solution.</li> <li>• Mimics calls routed to a PSAP when a subscriber calls from within the exchange served by</li> </ul>	<ul style="list-style-type: none"> <li>• Would not apply accurately to all callers because routing would be based on the official language of the majority of residents in the local exchange corresponding to that area code (i.e., call routing is region-based, not caller-based).</li> <li>• Does not factor in number portability, which allows subscribers to port their telephone</li> </ul>	<p>Any call where the telephone number is known</p>

	<p>that PSAP (i.e., routing is based on the preferred official language of the majority of residents in the region encompassing the area code).</p>	<p>numbers to other regions within Canada (i.e., VoIP and wireless).</p> <ul style="list-style-type: none"> <li>• Problematic for business and multiple-user accounts.</li> </ul>	
<p>Routing based on the cell site location</p>	<ul style="list-style-type: none"> <li>• Quicker to implement than collecting or using subscribers' reported language preference.</li> <li>• Mimics calls routed to a PSAP based on where the cell site is located (i.e., routing is based on the preferred official language of the majority of residents in the region encompassing the cell site).</li> </ul>	<ul style="list-style-type: none"> <li>• Would not apply accurately to all callers who connect to a cell site when placing an emergency call because routing is based on the official language of the majority of residents in the cell site's region (i.e., call routing is region-based, not caller-based).</li> <li>• Problematic for business and multiple-user accounts.</li> </ul>	<p>Wireless calls</p>

## Dissenting opinion of Commissioner Bram Abramson

1. The Commission imposes conditions to support access to emergency services.<sup>1</sup> That responsibility includes the routing arrangements on which emergency calls depend. Where emergency services routing intermediaries become part of the call chain, our role extends to ensuring calls are routed through those intermediaries in a way that supports timely and effective access to emergency assistance. Effective includes understandable.
2. Traditionally, emergency services routing intermediaries were delivered as call centres. A caller reached a human operator, spoke to them to identify the appropriate public safety answering point (PSAP), and routed it there. That remains an important part of the current system. But the routing function is no longer reducible to a human-powered call centre. Increasingly, emergency services routing involves a mix of human call-taking, preconfigured routing rules, call-associated data, and automated and AI-driven routing logic.
3. As technology and testing evolve, so too does this mix of functions. The objective should be a system in which the routing intermediary's role becomes increasingly transparent to the caller. The caller should experience a call as having reached the most relevant telecommunicator, in the best-supported language, at the most appropriate PSAP, without having to know or care how the routing function was performed.
4. I support the measures approved today by the Telecommunications Committee majority.<sup>2</sup> They improve the handling of calls that reach emergency services routing intermediaries. I dissent because the decision treats an interim fix as the whole task. It underspecifies the routing architecture the measures approved are meant to bridge towards. That silence shows up in two places: we name no destination for language-aware routing, and settle on area-code routing without testing whether a more granular proxy should be used in some circumstances. I take each in turn.

## Designing for the route, not just the crossing

5. The Commission's September 2024 letter asked the Emergency Services Working Group (ESWG) to examine official-language 9-1-1 access when emergency services routing intermediaries are used. The sector-wide process that resulted, which integrated Official Language Minority Community representatives into an environment often opaque to non-technical and non-service-provider personnel, is salutary. So is the resulting consensus report.

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<sup>1</sup> *Telecommunications Act*, paragraph 24.1(c), section 23, and section 2 (“telecommunications service”).

<sup>2</sup> On behalf of the Commission: *Telecommunications Committee*, By-Law No. 10 (CRTC), paragraph (e) (“[a]ny act or thing done by the Telecommunications Committee shall be deemed to be an act or thing done by the members [...]”), pursuant to paragraph 11(1)(b) and subsection 12(3) of the *Canadian Radio-television and Telecommunications Commission Act* (duties delegated to standing committees by by-law, as distinguished from assigning a particular file to a panel: *Shoan v. Canada (Attorney General)*, 2016 FCA 261, para 6).

6. But I fear we stopped short of the goal. Whether a bilingual telecommunicator is available when a call reaches a routing intermediary's human responder matters. The immediate measures properly address that issue. Yet the ESWG's work points to the deeper problem: in many cases, the system lacks the information required to route the call optimally, whether directly or through an intermediary, in the first place.
7. The most effective short- and medium-term solutions are those that serve as a waystation to a defined destination, rather than take us off-course. Our objective should not be merely to make contingency handling better, full stop. It should be to ensure calls are routed to the best-placed telecommunicator, providing service in the most relevant language, at the most appropriate PSAP, in a manner transparent to the caller.
8. That distinction is important because "intermediary call centre" increasingly describes today's implementation, not necessarily tomorrow's function. As Next Generation 9-1-1 (NG9-1-1) evolves, routing will depend more on standards-based data exchange, additional call data, automated routing logic, and language indicators associated with the call or caller. The regulatory concern should be with the routing function, not the physical call centre. A decision that treats the matter principally as a staffing and contingency issue risks aging badly.
9. I would have approved the immediate ESWG recommendations, while also directing the next stage of work. [ESRE0120](#) – *Intermediary 9-1-1 Call Centres and Caller's Official Language* (the Report)'s discussion of telecommunications service providers (TSPs) recording customer official-language preferences expresses the hope that additional language data may improve as standards develop, future service providers interconnect with NG9-1-1 networks, and unidentified future actors submit changes to then be approved by the National Emergency Number Association (NENA) into the NENA i3 standard.
10. With respect, that approach is too timid. Language support, including official and Indigenous language support, is a fundamental social requirement for Canadians and important to the social fabric of its regions. The barriers to an environment in which subscribers can specify in order their languages of preference, and emergency services routing intermediaries handle their calls in ways that respond to those preferences appropriately, are not only technological. They are equally questions of coordination, implementation, and not regulatory direction. Who is expected to do that work, toward what objective, in what sequence?
11. I do not call for a stand-alone solution outside the NENA i3 standard, even if such solutions have proved effective in the rapid PSAP environment. Standards-based work is essential to emergency communications. But standards do not implement themselves. Canadian requirements can and should be advanced through North American processes.<sup>3</sup> The NENA i3

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<sup>3</sup> This has proceeded apace in other settings. See, for instance, revisions to the American Registry for Internet Numbers' (ARIN) Number Resource Policy Manual and associated policies in response to the needs of Internet service providers reliant on cable carriers' Internet-Protocol-layer Third Party Internet Access (TPIA) tariff, at section 4.2.3.8 ("Reassignment for Third Party Internet Access (TPIA) over cable"). *Reassignments for Third-Party Internet Access (TPIA) over cable*, Draft Policy ARIN-2012-7, introduced 5 September 2012, implemented 16 January 2013.

Additional Data specification may be part of the answer. But the Commission should be less shy to identify what information ought to accompany an emergency call, who should provide it to whom, who should transmit and maintain it, and when the system ought to evolve beyond workarounds.

12. This is not a criticism of the ESWG for recommending measures that can be implemented now. The ESWG was asked to solve an immediate and serious operational problem. It did so through a set of practical recommendations. But the Commission's role is not limited to accepting an operational compromise. We should also identify the direction of travel. NENA standards are essential reference points. They are not a regulatory plan, and should not be mistaken for one. It is that plan's absence from which I respectfully dissent.

### **Area code and central office code routing**

13. The majority accepted area-code routing largely as presented in the Report. However, the record contains indications that more granular number-based routing may also be possible. If the Commission is prepared to rely on telephone number geography as an interim proxy, we should have explained why we approved area-code-level routing without first testing whether central-office-code routing would be a better imperfect proxy in some circumstances, as follows.
14. The Report recommends, and the majority orders, that TSPs required to use emergency services routing intermediaries adopt up to four routing solutions suitable for the short and medium term. Two of these solutions are best suited to voice over Internet Protocol (VoIP)-based calls. Another is best for wireless calls. The fourth, based on the caller's area code, is the most broadly implementable. It is also subject to significant limitations, including potential inaccuracy in the presence of number portability and business and multiple-user accounts.
15. In the North American Numbering Plan, the first three digits of a ten-digit telephone number identify the numbering plan area, or NPA. The next three digits are the central office code, or NXX. An NPA identifies a broad geographic region. An NPA-NXX combination is more granular and has traditionally been associated with local exchange community, rate centre, or community-level geography, even if that association is less reliable in a world of wireless service, VoIP, number portability, and non-native numbers.
16. The difference between NPA- and NXX-level granularity is significant. For example, three NPAs (705, 249, 683) are associated with central and northeastern Ontario, but within that broader region, particular NPA-NXX combinations are associated with communities such as Kapuskasing, Hearst or Greater Sudbury. Similarly, three NPAs (613, 343, 753) are associated with eastern Ontario, within which particular NPA-NXX combinations are associated with communities like Hawkesbury, Clarence-Rockland, or Alfred and Plantagenet.
17. Area code routing is therefore blunter than it would appear to need to be. A more granular NPA-NXX proxy would better approximate the language characteristics of the community associated with the caller's number. It would not eliminate number portability issues. It would not resolve the difficulty of business or multiple-user accounts. It would not make telephone-number geography a perfect substitute for caller location or caller language preference. But those

limitations already apply to area-code routing. Both NPA and NPA-NXX routing are imperfect. We should have asked whether the latter would be a better imperfect proxy than NPA routing alone.

18. Nor is administrative complexity, by itself, a sufficient answer. Longer NPA-NXX lists may be cumbersome for humans to read, but routing systems process differently, provided the data is complete, current, consistently structured, and operationally maintained. The harder questions are who would maintain those lists, how they would be validated, how frequently they would be updated, and whether they could be implemented safely across relevant call types. Those are the questions the Commission should have posed before approving area-code routing as the broad interim proxy.
19. The Report did contain signals pointing in this direction. TELUS Communications Inc. referred to routing based on “a combination of area code and phone numbers” and customer language preferences.<sup>4</sup> Northern911 similarly noted that TSPs may be able to route calls based on customer information or on geographical, area-code, or exchange-based routing.<sup>5</sup> The majority decision also requires complaint information that includes both the area code and central office code of the complainant’s number.<sup>6</sup> In that context, it is not clear why the Report did not address central office code routing as a potential refinement of area-code routing. I would have requested that information before finalizing approval. Here, too, my disagreement is narrow: not that area-code routing is wrong, but that we settled on it without asking a question the record had already half-posed.
20. None of this diminishes what the ESWG and Commission accomplished. The immediate measures should be approved. I dissent because the decision does the urgent thing and stops there. Approving a workable measure is not the same as naming the destination it serves. Our role includes both. We should have fixed an objective, given the next stage of standards work a place on the road map, and in the meantime asked whether central-office-code granularity is the better imperfect proxy. These are not reasons to withhold the interim measures. They are reasons not to stop with them.

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<sup>4</sup> ESRE0120, lines 187 and 229.

<sup>5</sup> ESRE0120, lines 241 to 242.

<sup>6</sup> Majority decision, above, Appendix 1.

## Related documents

- *Next-generation 9-1-1 network design efficiencies*, Telecom Regulatory Policy CRTC 2019-66, 7 March 2019
- *Emergency service obligations for local VoIP service providers*, Telecom Decision CRTC 2005-21, 4 April 2005